

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

H-D U.S.A., LLC,

Plaintiff,

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 21-cv-00499

**Judge Jorge L. Alonso**

**Magistrate Judge Sheila M. Finnegan**

**PRELIMINARY INJUNCTION ORDER**

THIS CAUSE being before the Court on Plaintiff H-D U.S.A., LLC’s (“Harley-Davidson” or “Plaintiff”) Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion for Entry of a Preliminary Injunction in its entirety against the fully interactive, e-commerce stores<sup>1</sup> operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (the “Seller Aliases”).

THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases offer shipping to the United States, including Illinois, accept payment in U.S. dollars and have sold products using infringing and counterfeit versions of Harley-Davidson’s federally registered trademarks (the HARLEY-DAVIDSON Trademarks”) to residents of Illinois. A list of the HARLEY-DAVIDSON Trademarks is included in the below chart.

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<sup>1</sup> The ecommerce store urls are listed on Schedule A hereto under the Online Marketplaces.

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
4,771,447	HARLEY-DAVIDSON	July 14, 2015	For: House mark for a full line of jewelry in class 014
3,690,031	HARLEY-DAVIDSON	Sep. 29, 2009	For: Non-luminous, non-mechanical tin signs, non-luminous, non-mechanical metal signs, tool boxes of metal, tool chests of metal, key rings of metal, and metal personal identification tags in class 006
3,490,890	HARLEY-DAVIDSON	Aug. 26, 2008	For: House mark for a line of motorcycles, structural parts for motorcycles and related motorcycle accessories, namely, seats, backrests, decorative fuel tank panels, transmission gears, fuel tanks, wheel sprockets, gear shifts, clutches, battery covers and straps, front rear, and intermediate kickstands, hub caps, shift knobs, foot rests and extensions, windshields, leg shields, fender tips, brake pedals, handlebar grips, safety guards, namely, bars for attachment to motorcycles, steering dampers, shock absorbers, spare wheels, spare wheel carriers, boot guards, namely, mud flaps and fenders, saddle covers, luggage carriers, license plate frames, handlebar cross bars, foot pedal pads, tank and fender pads, rearview, fenders and skirts, and wheel balance weights in class 012

3,393,840	HARLEY-DAVIDSON	Mar. 11, 2008	For: House mark for a full line of clothing, footwear and headwear in class 025
2,281,489	HARLEY-DAVIDSON	Sep. 28, 1999	For: Necklaces, bracelets, and watch bands in class 014
1,621,383	HARLEY-DAVIDSON	Nov. 06, 1990	For: Model toy motorcycles, miniature motorcycle replicas, model toy trucks, electronically operated toy motorcycles in class 028
1,606,282	HARLEY-DAVIDSON	Jul. 17, 1990	For: Safety goggles, protective helmets and sunglasses in class 009
1,602,474	HARLEY-DAVIDSON	Jun. 19, 1990	For: Belt buckles in class 026
1,450,348	HARLEY-DAVIDSON	Aug. 04, 1987	For: metal articles, namely, key fobs, key chains and license plate holders in class 006  For: Knife sheaths in class 008  For: Necklaces, earrings, pins of non-precious metals, clocks and watches in class 014  For: Children's books, bumper stickers, removable tattoos, pressure sensitive decals, checkbook covers, and playing cards in class 016  For: Leather goods, namely, purses, wallets, duffle bags, motorcycle saddle bags, and key fobs in class 018

			<p>For: Mirrors in class 020</p> <p>For: Mugs, drinking glasses, coasters, decanters, cups, and plastic mugs in class 021</p> <p>For: Towels, and bed spreads in class 024</p> <p>For: Sweat pants, sweaters, suspenders, scarves, bandanas, leather clothing, namely, jackets, vests, gloves, jeans, chaps, tops, boots, shorts, caps, belts, and parts of footwear, namely boot tips, in class 025</p> <p>For: Stuffed toy animals, toy banks, and model kits in class 028</p> <p>For: Cigarette cases, lighter cases, and cigarette lighters in class 034</p>
1,311,457	HARLEY-DAVIDSON	Dec. 25, 1984	<p>For: Repair and Servicing of Motorcycles in class 037</p> <p>For: Retail store services in the field of motorcycles in class 042</p>
1,234,404	HARLEY-DAVIDSON	Apr. 12, 1983	<p>For: Sunglasses and Protective Helmets for Motorcyclists in class 009</p> <p>For: Clothing-Namely, Jackets, Pants, Shirts, T-Shirts, Vests, Jeans, Riding Suits, Bandannas, Rain Suits, Shorts, Nightgowns, Halters, Underwear, Tank</p>

			Tops, Sweatshirts, Night Shirts, Socks, Gloves, Hats, Caps and Boots in class 025
1,219,955	HARLEY-DAVIDSON	Dec. 14, 1982	For: Parts and service manuals for motorcycles, parts catalogs for motorcycles, newsletters and magazines dealing with motorcycles, calendars, posters, and decals in class 016
1,078,871	HARLEY-DAVIDSON	Dec. 06, 1977	For: Vehicles-namely, motorcycles in class 012
526,750	<b>HARLEY – DAVIDSON</b>	Jun. 27, 1950	For: Motorcycles and structural parts thereof; accessories-namely, intermediate stands, seats, foot rests and extensions, windshields, fender tips, exhaust stacks, grips, name plates, saddle covers, luggage carriers, license frames, foot pedal pads, tandem seats, foot rests, and rear view mirrors in classes 007, 012, 022, and 027
508,160	HARLEY-DAVIDSON	Apr. 05, 1949	For: Electric lamps and spare parts for same; spark plugs; and electric signs in classes 007, 009, 011, 012, and 015
507,163	HARLEY-DAVIDSON	Mar. 01, 1949	For: Motorcycle shirts; sweaters; breeches; neckties; coveralls; rain coats and hats; jackets; helmets; caps; and boots in class 025

1,708,362	HARLEY	Aug. 18, 1992	For: Embroidered patches for clothing in class 026
1,683,455	HARLEY	Apr. 14, 1992	For: Shirts, tank tops, boots, and sweatshirts in class 025
1,406,876	HARLEY	Aug. 26, 1986	For: Clothing; namely--tee shirts for men, women and children; knit tops for women and girls; and children's shirts in class 025
1,352,679	HARLEY	Aug. 06, 1985	For: Motorcycles in class 012
4,955,539	HARLEY	May 10, 2016	For: Watches, rings, bracelets, necklaces, earrings, pins being jewelry; jewelry, namely, wrist cuffs, pendants, charms and ride beads for making jewelry in class 014
1,793,137	HARLEY OWNERS GROUP	Sep. 14, 1993	For: Hunting knives, pocket knives and knife cases in class 008  For: Road atlases, newsletters, magazines relating to motorcycling, playing cards, and decals in class 016  For: Key fobs, luggage, tote bags, and travel bags in class 018  For: Plastic and ornamental pins and badges in class 020  For: Glasses, mugs, cups, and insulated can holders in class 021

			<p>For: Textile flags and banners in class 024</p> <p>For: Clothing, namely, shirts, sweatshirts, t-shirts, caps, hats, jacket, vests, and bandanas in class 025</p> <p>For: Belt buckles and ornamental patches in class 026</p>
1,654,280	HD	Aug. 20, 1991	For: Jewelry, namely lapel pins, earrings, necklaces and bracelets in class 014
2,315,877	HD	Feb. 8, 2000	For: Shirts, jackets, vests, T-shirts, nightgowns, sweatshirts, nightshirts, gloves, hats, leather gloves in class 025
1,534,449	HD	Apr. 11, 1989	For: Decorative cloth patches and belt buckles of non-precious metal in class 026
2,042,130	HD	Mar. 4, 1997	For: Cigarette lighters, cigarette cases not made of precious metals, and holders for cigarette lighters not made of precious metals in class 034
1,716,992	HOG	Sep. 15, 1992	<p>For: Metal badges; figurines made of metal in class 006</p> <p>For: Clocks, watches, jewelry of precious and non-precious metal, namely, pins, charms, earrings, bracelets, necklaces, and rings; ornamental lapel pins; ashtrays, cigarette cases and holders of cigarette</p>

			<p>lighters of precious metals; belt buckles of precious metal in class 014</p> <p>For: Greeting cards, road atlas, posters, calendars, newsletters, books and magazines relating to motorcycling, paper banners relating to motorcycling, playing cards, decals, note paper, pens and pencils, checkbook clutches in class 016</p> <p>For: Drinking steins; glassware, namely, plates, cup saucers, glasses and other containers for food and beverage; mugs, cups, insulated can holders, commemorative plates, toothbrushes, quencher cups and figurines made of ceramic, porcelain and glass; leather can, glass and mug holders in class 021</p> <p>For: Flags and banners not of paper in class 024</p> <p>For: Clothing, namely, shirts, sweatshirts, t-shirts, caps, hats, jackets, vests, socks, shoes, boots, scarves, belts, sweat pants, pants, bandanas, gloves, suspenders, chaps, rainsuits, and mittens in class 025</p>
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			For: Belt buckles not of precious metals, ornamental pins and embroidered patches for clothing in class 026
1,263,936	 The Harley-Davidson logo is a registered trademark. It consists of the word "MOTOR" at the top in a stylized font, flanked by two vertical bars. Below it is the word "HARLEY-DAVIDSON" in a bold, sans-serif font, also flanked by vertical bars. At the bottom is the word "CYCLES" in a similar bold, sans-serif font, flanked by vertical bars. The entire logo is enclosed in a dark, shield-shaped border.	Jan. 17, 1984	<p>For: Medallions and non-luminous non-mechanical signs made primarily of metal and plastic in class 006</p> <p>For: Sunglasses, battery chargers, protective motorcycle crash helmets and luminous signs in class 009</p> <p>For: Electric lamps in class 011</p> <p>For: Mud flaps, fuel door plates, air cleaners, radio caddies, motorcycle tank and fender sets, leather motorcycle bags and motorcycles in class 012</p> <p>For: Jewelry - namely, necklaces, rings and key fobs in class 014</p> <p>For: Posters, paper decals and playing cards in class 016</p> <p>For: Wallets in class 018</p> <p>For: Decorative wall plaques and mirrors in class 020</p> <p>For: Mugs and insulated drinking steins in class 021</p> <p>For: Towels in class 024</p>

			<p>For: Clothing - namely, t-shirts, jackets, blue jeans, sweat shirts, underwear, bandanas, headwear, socks, boots, cycle riding suits, belts and suspenders in class 025</p> <p>For: Embroidered patches, belt buckles and lapel, hat and stick pins all of nonprecious metals in class 026</p> <p>For: Cigarette lighters in class 034</p>
4,601,391		Sep. 09, 2014	For: Cell phone covers in class 009
3,559,365		Jan. 13, 2009	For: House mark for a line of motorcycles, structural parts for motorcycles, and related motorcycle accessories, namely, seats, backrests, decorative fuel tank panels, transmission gears, fuel tanks, wheel sprockets, gear shifts, clutches, battery covers and straps, front, rear, and intermediate kickstands, hub caps, shift knobs, foot rests and extensions, windshields, leg shields, fender tips, brake pedals, handlebar grips, safety guards, namely, bars for attachment to motorcycles, steering dampers, shock

			absorbers, spare wheels, spare wheel carriers, boot guards, namely, mud flaps and fenders, saddle covers, luggage carriers, license plate frames, handlebar cross bars, foot pedal pads, tank and fender pads, rearview mirrors, fenders and skirts, and wheel balance weights in class 012
3,393,839		Mar. 11, 2008	For: House mark for a full line of clothing, footwear and headwear in class 025
3,185,946		Dec. 19, 2006	For: Jackets, baseball hats, caps, shirts and T-shirts in class 025
1,711,882		Sep. 01, 1992	For: Embroidered patches for clothing in class 026
1,660,539		Oct. 15, 1991	For: Knives; namely, buck knives, sporting and hunting knives, folding pocket knives, knife cases therefor, and tool kits comprising wrenches and pliers in class 008

		<p>For: sunglasses, and motorcycle parts; namely, gauges, batteries, and cruise controls in class 009</p> <p>For: Flashlights in class 011</p> <p>For: motorcycles and motorcycle parts; namely, air cleaners, drive belts, belt guards, brakes, chains, clutches, crankcases, engine cylinders, fenders and fender supports, footboards, forks, fuel tanks, leg guards, handlebars, cylinder heads, mirrors, oil filters, oil pumps, seats, shock absorbers, backrests, wheels, and windshields in class 012</p> <p>For: Ankle bracelets, bracelets, earrings, necklaces, rings, tie tacks, watch bands, watches, wall clocks, and ornamental lapel pins in class 014</p> <p>For: Books about motorcycles, calendars, decals, pens, photo albums, posters, and removable tattoos in class 016</p> <p>For: Holders for cans in the nature of a rubber cylinder, duffle bags, garment bags, key fobs, suitcases, and wallets in class 018</p> <p>For: Wall mirrors and wall plaques in class 020</p>
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			<p>For: Drinking glasses, mugs, and can holders in the nature of an insulated rubber cylinder in class 021</p> <p>For: Towels in class 024</p> <p>For: Belts, chaps, denim pants, gloves, hats, caps, jackets, neckties, night shirts, pants, rain suits, shirts, socks, suspenders, sweaters, sweatshirts, tank tops, athletic shoes, shoes, boots, t-shirts, underwear, vests and wristbands in class 025</p> <p>For: Belt buckles not made of precious metal, boot chains, and embroidered patches for clothing in class 026</p> <p>For: Automobile floor mats in class 027</p> <p>For: Toy trucks in class 028</p> <p>For: Lighter holders, cigarette cases, lighter cases, and lighters, all of the foregoing not being made of precious metal in class 034</p>
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1,263,936		Jan. 17, 1984	<p>For: Medallions and non-luminous non-mechanical signs made primarily of metal and plastic in class 006</p> <p>For: Sunglasses, battery chargers, protective motorcycle crash helmets and luminous signs in class 009</p> <p>For: Electric lamps in class 011</p> <p>For: Mud flaps, fuel door plates, air cleaners, radio caddies, motorcycle tank and fender sets, leather motorcycle bags and motorcycles in class 012</p> <p>For: Jewelry-Namely, Necklaces, Rings, and Key Fobs in class 014</p> <p>For: Posters, paper decals and playing cards in class 016</p> <p>For: Wallets in class 018</p> <p>For: Decorative Wall Plaques and Mirrors in class 020</p> <p>For: Mugs and Insulated Drinking Steins in class 021</p> <p>For: Towels in class 024</p> <p>For: Clothing-Namely, T-Shirts, Jackets, Blue Jeans, Sweat Shirts, Underwear, Bandanas, Headwear,</p>
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			<p>Socks, Boots, Cycle Riding Suits, Belts and Suspenders in class 025</p> <p>For: Embroidered patches, belt buckles and lapel, hat and stick pins all of non-precious metals in class 026</p> <p>For: Cigarette lighters in class 034</p>
1,205,380		Aug. 17, 1982	<p>For: Motorcycles in class 012</p> <p>For: Clothing-Namely, T-Shirts in class 025</p>
1,224,868		Jan. 25, 1983	<p>For: Decorative Items for Motorcycles-Namely, Medallions in class 006</p> <p>For: Fitted Motorcycle Covers in class 012</p> <p>For: Key Ring Fobs in class 014</p> <p>For: General Purpose Decals; Decorative Items for Motorcycles-Namely, Decals, and Metallic Foil Decals in class 016</p> <p>For: Drinking Cups and Mugs in class 021</p> <p>For: Clothing-Namely, Jackets, T-Shirts, Tank Tops, Sweat Shirts, Bandannas, Hats, Caps, and Boots in class 025</p> <p>For: Stick, Lapel, and Hat</p>

			<p>Pins, All of Nonprecious Metals, and Decorative Cloth Patches in class 026</p> <p>For: Cigarette Lighters in class 034</p>
2,376,674		Aug. 15, 2000	<p>For: Metal locks in class 006</p> <p>For: Motorcycle parts, namely, spark plugs in class 007</p> <p>For: Optical and safety equipment, namely, sunglasses and motorcycle helmets in class 009</p> <p>For: Motorcycle parts, namely, mirrors, drive belts made of rubber, swing arm pivot covers, axle nut covers, handgrips, oil pump covers, air cleaner covers, derby covers, caliper covers, seats, brake pedals, motorcycle saddlebags, saddlebag liners, timer covers and fender tips in class 012</p> <p>For: Jewelry in class 014</p> <p>For: Leather goods, namely traveling bags and saddlery in class 018</p> <p>For: Leather gloves in class 025</p>

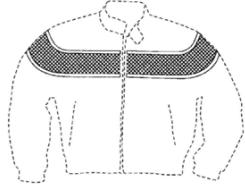
1,741,456		Dec. 22, 1992	For: Embroidered patches and belt buckles not of precious metals in class 026
1,511,060		Nov. 01, 1988	For: Clothing, namely, boots, sweat shirts, jeans, hats, caps, scarves, motorcycle riding suits, neck ties, shirts, t-shirts, jackets, vest, ladies tops, bandanas in class 025
3,447,304		Jun. 17, 2008	For: A full line of clothing in class 025
3,697,874		Oct. 20, 2009	For: Motorcycles and structural parts therefor in class 012
3,697,875		Oct. 20, 2009	For: Shirts, hats, caps in class 025

3,074,276		Mar. 28, 2006	For: Metal key chains in class 006
3,018,481		Nov. 22, 2005	For: Ornamental novelty pins in class 026
2,979,002		Jul. 26, 2005	For: Drinking glasses, mugs, and beverage glassware in class 021
2,973,501		Jul. 19, 2005	For: Bandannas, jackets, shirts, caps, hats, T-shirts, and leather jackets in class 025

4,601,394		Sep. 09, 2014	For: Cell phone covers in class 009
3,304,863		Oct. 02, 2007	For: Metal key fobs and non-luminous and non-mechanical metal signs in class 006
4,844,360		Nov. 03, 2015	For: Parts of motorcycles, excluding parts of all motors and engines, namely, derby covers, air cleaner trim, timer covers, battery cover band, fuel caps, brake caliper inserts, fender skirts, console doors, head lamp visors, medallions, foot pegs, gearshift linkages, foot board covers, handlebar clamps, hand grips, fuel gauges, guard rail inserts, axle nut covers, breather end cap, valve stem caps, foot boards, turn signal visors, pivot bolt covers, tank panel, fender tip lens kit, console insert, air cleaner cover, decorative end caps, mirrors and mounting hardware for the aforesaid goods in class 012

4,771,442		Jul. 14, 2015	For: A full line of jewelry in class 014
4,528,269		May 13, 2014	For: Jewelry, namely, earrings, necklaces in class 014
4,465,604		Jan. 14, 2014	For: Clothing, namely, shirts, hats, caps, belts, jackets, gloves, sweatshirts, lounge pants, and wrist bands in class 025
4,465,650		Jan. 14, 2014	For: Motorcycles and structural parts therefor in class 012
5,346,467	DAYMAKER	Nov. 28, 2017	For: Motorcycle headlamp in class 011

1,316,576	EAGLE IRON	Jan. 29, 1985	For: Motorcycle electrical parts, namely, coils, brushes, armatures, generators in class 007  For: Motorcycle parts, namely gear shafts, starters, clutches, sprockets, battery covers and straps, air cleaners and filters in class 012
3,818,854	FAT BOY	Jul. 13, 2010	For: Non-luminous, non-mechanical tin signs, non-luminous and non-mechanical metal signs in class 006
5,346,443	FXRG	Nov. 28, 2017	For: Helmets in class 009
5,493,726	FXRG	Jun. 12, 2018	For: Eyewear, body armor in class 009
2,530,093	FXRG	Jan. 15, 2002	For: Jackets, coats, suits, gloves and pants in class 025
5,770,303	FXRG	June 4, 2019	For: Clothing, namely, sweaters, jackets, scarves, bandannas, vests, jeans, pants, chaps, shirts, caps, hats, headgear for wear, belts, wristbands, coveralls, trousers, rain suits, rain coats, T-shirts, head bands, neck gators, socks, leg warmers, mittens, leather clothing, bibs; footwear, namely, shoes and boots in class 025.
2,817,659	MOTORCLOTHES	Feb. 24, 2004	For: Clothing, namely belts, coats, jackets, caps, hats, head wear, knit hats, gloves, jeans, pants, chaps, shorts, shirts, sweaters, halter tops, tank tops, T-

			shirts, sweatshirts, sweat pants, head bands, leather coats, leather jackets, leather pants, leather chaps, leather vests, nightgowns, night shirts, pajamas, rain coats, rain suits, scarves, lingerie, underwear, vests, and wristbands; footwear; namely, shoes and boots in class 025
3,734,072	SCREAMIN' EAGLE	Jan. 5, 2010	For: Caps, jackets, shirts, and sweatshirts; t-shirts in class 025
1,434,821	WILLIE G	Mar. 31, 1987	For: Jackets in class 025
2,892,609	 “Orange Stripe Design” (a wide orange stripe outlined by two narrow stripes)	Oct. 12, 2004	For: Clothing, namely jackets, shirts in class 025
3,110,597	STREET BOB	Jun 27, 2006	For: Motorcycles and motorcycle structural parts in class 012

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order (“TRO”) should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Harley-Davidson’s previously granted Motion for Entry of a Temporary Restraining Order establishes that Harley-Davidson has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Harley-Davidson will suffer irreparable harm if the injunction is not granted. Specifically,

Harley-Davidson has proved a *prima facie* case of trademark infringement because (1) the HARLEY-DAVIDSON Trademarks are distinctive marks and are registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use any of the HARLEY-DAVIDSON Trademarks, and (3) Defendants' use of the HARLEY-DAVIDSON Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Harley-Davidson. Furthermore, Defendants' continued and unauthorized use of the HARLEY-DAVIDSON Trademarks irreparably harms Harley-Davidson through diminished goodwill and brand confidence, damage to Harley-Davidson's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Harley-Davidson has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. As such, this Court orders that:

1. Defendants, their officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:
  - a. using the HARLEY-DAVIDSON Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Harley-Davidson product or not authorized by Harley-Davidson to be sold in connection with the HARLEY-DAVIDSON Trademarks;
  - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Harley-Davidson product or any other product produced by Harley-Davidson, that is not Harley-Davidson's or not produced under the authorization, control or supervision

- of Harley-Davidson and approved by Harley-Davidson for sale under the HARLEY-DAVIDSON Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Harley-Davidson, or are sponsored by, approved by, or otherwise connected with Harley-Davidson;
  - d. further infringing the HARLEY-DAVIDSON Trademarks and damaging Harley-Davidson's goodwill; and
  - e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Harley-Davidson, nor authorized by Harley-Davidson to be sold or offered for sale, and which bear any of Harley-Davidson's trademarks, including the HARLEY-DAVIDSON Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.
2. Upon Harley-Davidson's request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate, (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Harley-Davidson expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, and all associated e-mail addresses;
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces; and
  - c. any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions including, without limitation, PayPal, Inc. ("PayPal"), Alipay, Alibaba, Ant Financial Services Group ("Ant Financial"), Amazon Pay, Wish.com, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
3. Upon Harley-Davidson's request, those with notice of the injunction, including Third Party Providers as defined in Paragraph 2, shall, within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the HARLEY-DAVIDSON Trademarks.

4. Defendants shall be temporarily and preliminarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
5. Any Third Party Providers, including PayPal, Wish.com, Alipay, Alibaba, Ant Financial and Amazon Pay, shall, within ten (10) business days of receipt of this Order:
  - a. locate all accounts and funds connected to Defendants' Seller Aliases and Online Marketplaces, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibit 3 to the Declaration of Adraea M. Brown, and any e-mail addresses provided for Defendants by third parties; and
  - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
6. Harley-Davidson is authorized to issue expedited written discovery, pursuant to the Federal Rules of Civil Procedure 33, 34 and 36, related to:
  - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, including any and all associated e-mail addresses; and
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces.

Harley-Davidson is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

7. Harley-Davidson may provide notice of these proceedings to Defendants, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order and other relevant documents on a website and by sending an e-mail to the e-mail addresses identified in Exhibit 3 to the Declaration of Adraea M. Brown and any e-mail addresses provided for Defendants by third parties that includes a link to said website. The Clerk of the Court is directed to issue a single original summons in the name of “The Partnerships and all other Defendants identified in the Complaint” that shall apply to all Defendants. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.
8. Schedule A to the Complaint [2], Exhibit 3 to the Declaration of Adraea M. Brown [15], and the TRO [24] are unsealed.
9. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules.

10. The \$10,000 bond posted by Harley-Davidson shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

IT IS SO ORDERED.

DATED: March 4, 2021



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Jorge L. Alonso  
United States District Judge

**H-D U.S.A., LLC v. The Partnerships and Unincorporated Associations Identified on Schedule "A" - Case No. 21cv-00499**

## Schedule A

No.	Seller Aliases	No.	Seller Aliases
1	OUR SALAN Store	2	SHIMANOx Store
3	MAGE WORLD Bike Wholesaler Store Store	4	Europe 3d picture
5	Aaron., co ltd Store	6	EVA LADY Official Store
7	CROSSSUNAI Store	8	shimanoplus Store
9	GUO BIKE Store	10	Karnoz Store
11	pengrongup Official Store	12	Shop5251344 Store
13	iDzn Newborn Clothes Store	14	Domomo Store
15	KENDIM SECTIM Store	16	Mother Clothes Show Store
17	NewBetter Store	18	GROMD Store
19	Cystal Accessories Store	20	Shop5885764 Store
21	Shop5885784 Store	22	Dafu design Store
23	Shop900249236 Store	24	t-shirt016 Store
25	Sundrewr Store	26	Shop910331347 Store
27	nilart_word Store	28	VectorWear Store
29	Shop910367296 Store	30	Shop910558312 Store
31	Shop910640048 Store	32	StevenXjan Store
33	Shop910729150 Store	34	Shop910737084 Store
35	FH digital 017 Store	36	Shop910745159 Store
37	Shop910747155 Store	38	Shop910873006 Store
39	Shop910948053 Store	40	Shop910949027 Store
41	Shop910951065 Store	42	Shop910965071 Store
43	Reinventing trend Store	44	Shop910976001 Store
45	Shop910988071 Store	46	Farraw Store
47	Shop911017063 Store	48	Shop911051034 Store
49	KDH8 Store	50	JT Shoping
51	WANG CHUNMEI	52	FuXindream
53	TYHGF	54	Heinmo
55	SZRZTR	56	taiyuanshiyingzequyangboshuguodian
57	June-US	58	liaohuile2
59	tyrertyr	60	Natasha Breeden
61	NYFlying	62	AmaAguirrend
63	Wofei mall	64	sazwdk
65	kaifenghuangcaishangmaoyouxiangongsi	66	4CAR&

No.	Seller Aliases	No.	Seller Aliases
67	WANGJQIN	68	Weiy Personality Store
69	A15VU8DMFXALLY	70	W-TinSigns
71	LeiChuangShangMao	72	Kacol-Studio
73	Lvliahshilishihebianpingzonghejinxiaobu	74	HSZSY
75	MEIYAQQ	76	Twifon ZZY CYAN
77	shenzhenshiyuqianyigoudianziyouxi anbfflpv	78	Kardiya
79	UntilYouGifts	80	EAGFLY
81	QiDongXianQuanDeBaiHuodian	82	SUEXI
83	WANSU commerce and trade	84	RiZhaoTianChongShangMaoYouXianGongSi
85	aairprdds	86	WENDING88
87	seatesme266	88	KeLin
89	HZSXMASK	90	Ang-xw
91	QuanQuan-us	92	HIBEOULEB
93	rdtyhrtu	94	ogdfdrffdd
95	A1D0416K3CM5P7	96	HeNanGeDaJiXieSheBeiAnZhuangYuxianGongSi
97	FGJIUSHINIU	98	CKeKe
99	Never night sky	100	guang zhou ye sen fu shi you xian gong si
101	Radella	102	Tseven Store
103	ShenZhenShiDongBinShiYeYouXianGongSi	104	QPLAYnm
105	SSHSHOP	106	TongChengMinLanBaiHuodian
107	BEER#	108	qinhanxinchengheyihaobaihodian
109	liangzisupermarket	110	SNIDKES
111	huihoushihuichengquminggebianidian	112	TOPUSE
113	SUHERVEX	114	SHUIZAABA
115	OfinaZyx	116	Greeeen Parrot
117	A1K875DDN1YN1A	118	lv liang shi li shi qu xiao cao bian lidian
119	dingyashangmao	120	ningyu decor
121	Small beautiful sister	122	unyuexuefu
123	PTDMD	124	Mal-II
125	ShenYangTieXiQuYiMaoJianCaiDian	126	lv liang shi li shi qu wei ying bian lidian
127	HeNanKeZuoShangMaoYouXianGongSi	128	JJFHGYUW
129	SrySmUS	130	SerendS

No.	Seller Aliases	No.	Seller Aliases
131	FMLAC	132	ABCDOR
133	JIAHEJIA	134	BiBuBaLa
135	ninglingxianbahuirizapu	136	Pendapu
137	SuperFan	138	maiJiaJianBingDian
139	putianshichengxiangqulvnongyimipu	140	Bvancuh
141	WENBINXSL	142	SONGWIEUS
143	ShanDongHuiZeFuWuWaiBao	144	Simon-Stark
145	GaoXinQuMeiHengDaDianZiChanPinJingYingBu	146	Noki home
147	QingXinQuTaiHeZhenXuFengJianCaiDian	148	OAZNnk0
149	Powit	150	VAYUDD
151	tianlanqu	152	LinXianTuBanLiGuoChaoShi
153	Kooqi	154	SANZHUCAO
155	LOVELYSOUL	156	Travel Poster
157	Sattfashion	158	Bright world us
159	Ho Nok TAT trading company	160	lucky baby#
161	FLYING SMART DEVELOPMENT LIMITED	162	ONE-THREE-ONE
163	CHENGKUO	164	RenChengQuDaZiRanChongWuShiPinDian
165	NBHHPLS	166	Hi-WISH
167	erdfrtfded	168	Tisha Reveiro
169	Bimkole	170	Hao Shunda
171	Pet DreamWorks	172	WANLINGRR
173	Lucsy	174	Qin Guo She Ji
175	RMLiu	176	My_OP_Home
177	WHMPJG	178	LoveStar-Us
179	Day Romero	180	ouaomaoyi
181	FliFlition	182	Onlyhu
183	Baby ying	184	Tesgo-DIY
185	suyuqxihgahabochongwudian-1	186	qutichenwangluokejiyouxiangongsi
187	A2C3SC020G3WLH	188	Chaobaotongzhuang Store
189	shenzhenshichenyunshiyeyouxiango ngsi	190	CHENYAN00
191	U9U3QP59UK	192	sterrp
193	Million Questions	194	Sunflower Home
195	Homus	196	900 million Accessories
197	DOORZ	198	BQQDP

No.	Online Marketplaces	No.	Online Marketplaces
1	aliexpress.com/store/1190688	2	aliexpress.com/store/1687429
3	aliexpress.com/store/1798202	4	aliexpress.com/store/2301020
5	aliexpress.com/store/2677075	6	aliexpress.com/store/2685025
7	aliexpress.com/store/4015012	8	aliexpress.com/store/4481046
9	aliexpress.com/store/5043036	10	aliexpress.com/store/5079507
11	aliexpress.com/store/5082477	12	aliexpress.com/store/5251344
13	aliexpress.com/store/5253160	14	aliexpress.com/store/5268014
15	aliexpress.com/store/5367020	16	aliexpress.com/store/5781559
17	aliexpress.com/store/5874747	18	aliexpress.com/store/5875899
19	aliexpress.com/store/5877564	20	aliexpress.com/store/5885764
21	aliexpress.com/store/5885784	22	aliexpress.com/store/5891432
23	aliexpress.com/store/900249236	24	aliexpress.com/store/900254056
25	aliexpress.com/store/910328017	26	aliexpress.com/store/910331347
27	aliexpress.com/store/910342078	28	aliexpress.com/store/910367014
29	aliexpress.com/store/910367296	30	aliexpress.com/store/910558312
31	aliexpress.com/store/910640048	32	aliexpress.com/store/910729025
33	aliexpress.com/store/910729150	34	aliexpress.com/store/910737084
35	aliexpress.com/store/910741124	36	aliexpress.com/store/910745159
37	aliexpress.com/store/910747155	38	aliexpress.com/store/910873006
39	aliexpress.com/store/910948053	40	aliexpress.com/store/910949027
41	aliexpress.com/store/910951065	42	aliexpress.com/store/910965071
43	aliexpress.com/store/910972038	44	aliexpress.com/store/910976001
45	aliexpress.com/store/910988071	46	aliexpress.com/store/910994069
47	aliexpress.com/store/911017063	48	aliexpress.com/store/911051034
49	aliexpress.com/store/911060152	50	amazon.com/s?me=A1FPDBNC5M9I W&marketplaceID=ATVPDKIKX0DER
51	amazon.com/s?me=A1R3M7XG386 1YV&marketplaceID=ATVPDKIKX0D ER	52	amazon.com/s?me=A2QF4P9LBE84IX &marketplaceID=ATVPDKIKX0DER
53	amazon.com/s?me=A2T4SAR8E8LC 0&marketplaceID=ATVPDKIKX0DER	54	amazon.com/s?me=A316BIAY0DI2MI &marketplaceID=ATVPDKIKX0DER
55	amazon.com/s?me=A32PCHAQHS8 Q72&marketplaceID=ATVPDKIKX0D ER	56	amazon.com/s?me=A33N47GNK2A18 B&marketplaceID=ATVPDKIKX0DER
57	amazon.com/s?me=A3I7DY6GIL62T Q&marketplaceID=ATVPDKIKX0DER	58	amazon.com/sp?seller=A11CN8VU7T YTVU
59	amazon.com/sp?seller=A11HFKCP MIQQEE	60	amazon.com/sp?seller=A11P5EW1XE 8MJD
61	amazon.com/sp?seller=A11V0K6ST 5BTMC	62	amazon.com/sp?seller=A11W48AUKH HD2X
63	amazon.com/sp?seller=A13BTZU2N HLTWR	64	amazon.com/sp?seller=A142WU7YW 9F85P

No.	Online Marketplaces	No.	Online Marketplaces
65	amazon.com/sp?seller=A14PKWU7 COCHZQ	66	amazon.com/sp?seller=A14RJ35JZNW IF4
67	amazon.com/sp?seller=A14VTLHDF MECIS	68	amazon.com/sp?seller=A15U1X03UA USHB
69	amazon.com/sp?seller=A15VU8DM FXALLY	70	amazon.com/sp?seller=A167LOJANQ DWR8
71	amazon.com/sp?seller=A167RVJ68 3V26U	72	amazon.com/sp?seller=A16EJSD3EI7O Y0
73	amazon.com/sp?seller=A16NY0YKJ WSYFJ	74	amazon.com/sp?seller=A16UH21PL18 M4K
75	amazon.com/sp?seller=A1733FRDX 9YNTY	76	amazon.com/sp?seller=A179TY9M2QI ZG6
77	amazon.com/sp?seller=A17EDZ8Q2 QFCHN	78	amazon.com/sp?seller=A17PZQAT1NL VIQ
79	amazon.com/sp?seller=A17VMSJM DCMEC6	80	amazon.com/sp?seller=A18378V77T9 BHT
81	amazon.com/sp?seller=A18COLUSS BKRX	82	amazon.com/sp?seller=A196R56T4M MSY1
83	amazon.com/sp?seller=A19HNK1D OSPCC2	84	amazon.com/sp?seller=A19L47M0G9 QVHO
85	amazon.com/sp?seller=A19U8L6GG 2GEHP	86	amazon.com/sp?seller=A1AB3TZB8IQ NI0
87	amazon.com/sp?seller=A1AM1TM8 44645B	88	amazon.com/sp?seller=A1APNEQZPK 2LKQ
89	amazon.com/sp?seller=A1ATLDNVY 7TEFP	90	amazon.com/sp?seller=A1AUS05TQQ 4XZM
91	amazon.com/sp?seller=A1BEHT1Q1 ZPW8Q	92	amazon.com/sp?seller=A1BKF3C1GU QHLP
93	amazon.com/sp?seller=A1BQDIVRA S6AJ7	94	amazon.com/sp?seller=A1C8JA6NR2S 2GQ
95	amazon.com/sp?seller=A1D0416K3 CM5P7	96	amazon.com/sp?seller=A1DB7S29HSK S2M
97	amazon.com/sp?seller=A1DHHD P3 GE0OQ4	98	amazon.com/sp?seller=A1E8Y6HTZEX V9Z
99	amazon.com/sp?seller=A1EH0GRX2 BP1IF	100	amazon.com/sp?seller=A1FAPH C3E1H XO7
101	amazon.com/sp?seller=A1FD5PRK2 ZI6RI	102	amazon.com/sp?seller=A1FKCYXBWY 3RDB
103	amazon.com/sp?seller=A1G0QIM4 UPYL2R	104	amazon.com/sp?seller=A1G7BEJZZPC 5OQ
105	amazon.com/sp?seller=A1GKA62C0 HU97R	106	amazon.com/sp?seller=A1GXQQ6ZTM FU3D

No.	Online Marketplaces	No.	Online Marketplaces
107	amazon.com/sp?seller=A1GY69FA076RS1	108	amazon.com/sp?seller=A1GZT14VV2FHZT
109	amazon.com/sp?seller=A1HCFLTWFYQFH4	110	amazon.com/sp?seller=A1HOOYKM4T74ZN
111	amazon.com/sp?seller=A1HW7YW D716HNL	112	amazon.com/sp?seller=A1ICMHX2TC M1J0
113	amazon.com/sp?seller=A1IHQ72ZN RGXS	114	amazon.com/sp?seller=A1JGQQLUHD 6GF1
115	amazon.com/sp?seller=A1JKTUJRA VLBP7	116	amazon.com/sp?seller=A1K1068YJN5 0F8
117	amazon.com/sp?seller=A1K875DDN 1YN1A	118	amazon.com/sp?seller=A1L3Z60MRRJ M9P
119	amazon.com/sp?seller=A1LHGM8B ZV4ZMW	120	amazon.com/sp?seller=A1MEOG7LDH KJBO
121	amazon.com/sp?seller=A1N0BT2FB MIGY	122	amazon.com/sp?seller=A1NK2CC2VX H98H
123	amazon.com/sp?seller=A1NQP683B FXTH2	124	amazon.com/sp?seller=A1NSN29I316 11B
125	amazon.com/sp?seller=A1NUEC7IN U8PWS	126	amazon.com/sp?seller=A1NXEXAFS28 F3N
127	amazon.com/sp?seller=A1O0U5V4 GBRZN7	128	amazon.com/sp?seller=A1O5VP82GTI ZS4
129	amazon.com/sp?seller=A1PA5FO3I CS0AI	130	amazon.com/sp?seller=A1PMHEYUXYP ENW8
131	amazon.com/sp?seller=A1Q9PCGRT GMNWP	132	amazon.com/sp?seller=A1QC0TT9GN T5QY
133	amazon.com/sp?seller=A1QCKJ9TM Z8F0N	134	amazon.com/sp?seller=A1QFAX2O8H BKFR
135	amazon.com/sp?seller=A1QHBYX45 KG3CZ	136	amazon.com/sp?seller=A1R18QEDDV DS7V
137	amazon.com/sp?seller=A1RK0XEIP O40Z2	138	amazon.com/sp?seller=A1RQZZD36X2 BOJ
139	amazon.com/sp?seller=A1SANQ9O YEWM8D	140	amazon.com/sp?seller=A1ST336ZYG W4O0
141	amazon.com/sp?seller=A1SW56PZ0 34LK6	142	amazon.com/sp?seller=A1SYKGBXR24 FPX
143	amazon.com/sp?seller=A1TQPWCP K1OJZ7	144	amazon.com/sp?seller=A1TUTEBX65S WTY
145	amazon.com/sp?seller=A1U1M9FF HMLJ47	146	amazon.com/sp?seller=A1UD98RW 63T0D
147	amazon.com/sp?seller=A1V35X45 MZR2DW	148	amazon.com/sp?seller=A1VRETKGC0 MRH8

No.	Online Marketplaces	No.	Online Marketplaces
149	amazon.com/sp?seller=A1W0D0L5 ORLG6Y	150	amazon.com/sp?seller=A1WE6QADO NSS4N
151	amazon.com/sp?seller=A1WND5Q D85EICM	152	amazon.com/sp?seller=A1WUOOFJC0 DBC6
153	amazon.com/sp?seller=A1Y4RIXZ1 OJIL7	154	amazon.com/sp?seller=A1Y7FO6QA5 2DNL
155	amazon.com/sp?seller=A1YBTBS1A 2TFF5	156	amazon.com/sp?seller=A1YLEILXHKO AUY
157	amazon.com/sp?seller=A1ZI1V21HE 3MW0	158	amazon.com/sp?seller=A20ADQ2OV WF7FZ
159	amazon.com/sp?seller=A20BF15BA YBZCY	160	amazon.com/sp?seller=A20OHZ3F416 UZE
161	amazon.com/sp?seller=A21CT0FIFF C35D	162	amazon.com/sp?seller=A22REJZX7JTE 05
163	amazon.com/sp?seller=A2399QH00 X7KUG	164	amazon.com/sp?seller=A23EDYLHZD2 PX9
165	amazon.com/sp?seller=A23J441O1 AIBE9	166	amazon.com/sp?seller=A23LJ6LNIQM 71Q
167	amazon.com/sp?seller=A255UJTP0 HUJWL	168	amazon.com/sp?seller=A256YZJA9C4J 0B
169	amazon.com/sp?seller=A25EPAT35 P0G39	170	amazon.com/sp?seller=A25GYBGGV1 9Z06
171	amazon.com/sp?seller=A25VA74V1 FBTFV	172	amazon.com/sp?seller=A25X21NCAS OHN5
173	amazon.com/sp?seller=A261I20CT6 OVLO	174	amazon.com/sp?seller=A2676L8BQSX 2VW
175	amazon.com/sp?seller=A26E2UVFE 6UUM8	176	amazon.com/sp?seller=A27FIWCZW7 5PBX
177	amazon.com/sp?seller=A27MN4A2 8BNSGW	178	amazon.com/sp?seller=A2824C2C34B 29S
179	amazon.com/sp?seller=A29BJSXFO YIOMH	180	amazon.com/sp?seller=A29KWU8KJV B8NX
181	amazon.com/sp?seller=A29UWE5P CPH3Y5	182	amazon.com/sp?seller=A2AEUVP1G7 7AK
183	amazon.com/sp?seller=A2AKQ8F4Q OSNQN	184	amazon.com/sp?seller=A2B7MEBMQ ZN8NO
185	amazon.com/sp?seller=A2BGC3Y1T RER7L	186	amazon.com/sp?seller=A2BLADRRFZ4 MEL
187	amazon.com/sp?seller=A2C3SC020 G3WLH	188	amazon.com/sp?seller=A2C5WGE35E GI60
189	amazon.com/sp?seller=A2CWGTFU 2OJ314	190	amazon.com/sp?seller=A2D3CFHVNA UVNM

No.	Online Marketplaces
191	amazon.com/sp?seller=A2E52N3SH QLOYL
193	amazon.com/sp?seller=A2FEF34GA SAL78
195	amazon.com/sp?seller=A2FS7S48M BIZO6
197	amazon.com/sp?seller=A2GF1BQX2 KUMPM
192	amazon.com/sp?seller=A2E9H00H78X 9VU
194	amazon.com/sp?seller=A2FRG5NIA1K P7O
196	amazon.com/sp?seller=A2G7EJ8PSO0 EF5
198	amazon.com/sp?seller=A2GIDDJK6VO 5XA